

DATE MAILED

OCT 29 2002

BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation of Area Code Relief for the 715 Area Code in Northern
Wisconsin

05-TN-100

NOTICE OF INVESTIGATION

THIS IS AN INVESTIGATION to consider a petition filed on August 12, 2002, by NeuStar, Inc., ("NeuStar")¹ in its role of North American Numbering Plan Administrator ("NANPA"), on behalf of the Wisconsin telecommunications industry, requesting Commission approval of an area code relief plan for the 715 area code. NeuStar estimates that available telephone numbers in the 715 area code will exhaust in early 2005.²

To ensure that telephone numbers remain available in this area, this investigation is opened under Wis. Stat. §§ 196.02 and 196.37 and under the delegated authority of 47 C.F.R. § 52.19 to address numbering issues in the 715 area code and the introduction of another area code in that portion of northern Wisconsin now served by the 715 area code.

A complete copy of the NeuStar petition for area code relief can be seen on the Commission's website at http://www.psc.state.wi.us/telecom/cases/rec_apps/recentap.htm.

The potential need for another area code in the 715 area is prompted by the growth of telecommunications competition and by demands for new telecommunications services and telephone numbers. The growing use by the public of wireless telephones, pagers, facsimile machines, and modems³ and the increasing appearance of new service providers⁴ have consumed additional telephone numbers.

¹ The Federal Communications Commission ("FCC") has primary jurisdiction over all numbering issues in North America. The FCC has contracted with NeuStar for various number administration functions, including that of serving as the NANPA.

² Telephone numbers within an area code are a finite quantity. Telephone numbers in the United States are composed of a three-digit area code, a three-digit central office code, and a four-digit line number. This numbering format is specified by the North American Numbering Plan ("NANP"). For example, for the telephone number 715-555-9999, the area code is 715, the central office code is 555, and the line code is 9999. Area codes are more formally called numbering plan area ("NPA") codes. Central office codes are often referred to as NXX codes, where "N" is any number 2-9, and "X" is any number 0-9. An area code has 792 potentially assignable NXX codes. Up to 10,000 line codes can be assigned in an NXX, although when a central office code reaches 75-90 percent of capacity, a new central office code prefix is usually implemented.

³ For example, a customer with a residential line for normal use, a second line for a modem connection to a personal computer, another line for use by the children in the home, and a cellular telephone uses four distinct seven-digit telephone numbers. Of course, other combinations of service are also possible, and lines needed for business purposes would add further demand for numbers.

The basic options for area code relief in the 715 area (as in other parts of the country) are an overlay and a geographic split. Attachment A to this Notice discusses the parameters of overlays and geographic splits as options for area code relief. Neither an overlay nor a geographic split plan for area code relief changes the rates to customers for long distance or local calls.

When NeuStar recognized the approaching exhaust of available telephone numbers in the 715 area code, it convened a meeting of a telecommunications industry team to examine the viable alternatives and steps to provide for number relief and to achieve the implementation of a new area code. That industry team identified two basic alternatives for changing the 715 area code: an overlay and a geographic split. By a letter dated August 12, 2002, NeuStar wrote, on behalf of the industry team, to advise the Commission that the industry had considered various geographic split and overlay alternatives and that the telecommunications industry participants "reached consensus to recommend ...the all-services overlay plan" be deployed in 715 to provide the needed relief. As an alternative, if the Commission decides not to adopt an overlay plan, the industry participants examined various geographic split options and agreed to recommend a specific geographic split called Alternative 6.⁵

The Commission will investigate the use of telephone numbers and the options for area code relief in the 715 area code and, as needed, will order an area code relief plan 1) to best meet the needs of the public, 2) to assure that telephone numbers are available when needed, 3) to ease the impact of the relief plan on providers and customers, 4) to be competitively fair, and 5) to reflect community and customer concerns.

The Commission's investigation will look at the options presented by NeuStar and the industry participants, the circumstances that led to the depletion of available numbers in the 715 area, the impacts of number conservation efforts on available numbers and the expected exhaust of the 715 area code, the availability and impacts of local number portability and the deployment of thousands block pooling in this area,⁶ the potential for using currently protected NXX codes in the 715 area code⁷, and other matters that relate to the need for area code relief and to

⁴ As new telecommunications companies enter the market, they request and are assigned NXX codes so that they can serve their customers. Under the traditional assignment process, each such assignment used a full NXX (and its associated line numbers) for every provider in every community that they wished to serve. The FCC now is implementing thousands block pooling of numbers, so that, in some instances, a provider that needs additional numbers can get those numbers in blocks of 1,000 numbers rather than 10,000 numbers. Thousands block pooling is scheduled for portions of the 715 area code in 2003. The availability of thousands block pooling was factored into the forecasted exhaust date of the 715 area code – the 2nd quarter of 2005.

⁵ Alternative 6 (Attachment C to this Notice) would split the 715 area code into two area codes with the dividing boundary separating the current area into an eastern and western half. The map of this split alternative is attached to this notice. Other geographic split alternatives are part of the NeuStar petition.

⁶ Local number portability ("LNP") is a system under which a customer can switch local service provider, but keep the same number (at the same geographic location). The number is "ported," or transferred from one carrier to another. LNP is required for thousands block number pooling. See footnote 4 *supra*.

⁷ A protected code is not available for assignment. The NeuStar petition includes a listing of 62 NXX codes currently protected in the 715 area code.

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determination of the most appropriate area code relief plan.⁸ Participation by the public and the telecommunications industry on all these matters is encouraged.

The Commission will conduct this investigation by accepting comments from interested persons and by holding public hearings. The Commission will issue a further notice to set a comment schedule and the dates, times and locations of public hearings on this matter.

The Commission does not discriminate on the basis of disability in the provision of programs, services, or employment. Any person with a disability who needs accommodations to participate in this proceeding or who needs to obtain this document in a different format should contact the docket coordinator listed below. Questions regarding this matter may be directed to docket coordinator Chela O'Connor, Senior Rate Analyst, at (608) 267-9766.

Dated at Madison, Wisconsin, October 29, 2002

By the Commission:



Lynda L. Dorr
Secretary to the Commission

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Attachments

⁸ With respect to a geographic split, this includes examining where to split the area codes and determining which of the areas keeps the 715 code and which gets the new area code.

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**OVERLAY and GEOGRAPHIC SPLIT
options for area code relief in the 715 area code.**

OVERLAY

With an **overlay**,¹ the current 715 area code would remain the same. All current customers could retain their existing telephone numbers, including the 715 area code.

A map of the current 715 area is attached to this Notice as Attachment B (called Alternative #1 in the NeuStar/industry filing); with an overlay, both 715 and the new area code would be used throughout this area.

With an overlay, when all the available central office numbers (the NXX codes) have been used in the 715 area, new NXXs and telephone numbers would then be assigned using the new area code. This means that customers in the current 715 area, even in the same communities (or conceivably, in some cases, in the same buildings), could have different area codes. With an overlay, calling between customers with different area codes requires ten-digit dialing. Further, the FCC rules for area code assignments specify that with an overlay, **all** calling within the overlay area must use the area code. So, even a local call within a community, from one 715 telephone number to another 715 telephone number would need to be dialed using the area code.

With an overlay, existing customers need not make number changes or print new written materials, such as stationery, business cards, advertisements, or billing forms (unless they needed to add the area code to those items); however, customers may need to reprogram certain equipment (e.g., fax machines, alarm systems, etc.) to accommodate ten-digit dialing.

NeuStar estimates that with the overlay plan, no further area code relief would be needed in this area for 12 years.

An overlay plan for area code relief has no impact on the rates for long distance or local calling.

¹ The overlay plan would apply to all services, wire-based and wireless. This is the all-services overlay referenced in the NeuStar petition.

GEOGRAPHIC SPLIT

With a **geographic split**, the current 715 area would be divided in two. In one area, there is no area code change. Customers in that area would keep their current telephone numbers and the 715 area code. In the other area, customers would keep their current seven-digit telephone numbers, but they would have to change their area code from 715 to the new code. This would require customers to change their stationery, business cards, billing forms, advertising and other materials that include a telephone number.

A geographic split plan would, in some locations, divide counties, towns, villages, or even cities between the two area codes. The same is true for some school districts. Where a geographic split line runs between telephone exchanges that currently have local calling, via extended area service or extended community calling (ECC), the calling rates do not change; however, it becomes necessary to dial additional digits (the area code) for these local calls. The area code must be used on all calls placed between the two area codes; however, with a geographic split, seven-digit dialing remains viable for local calling within the area code.

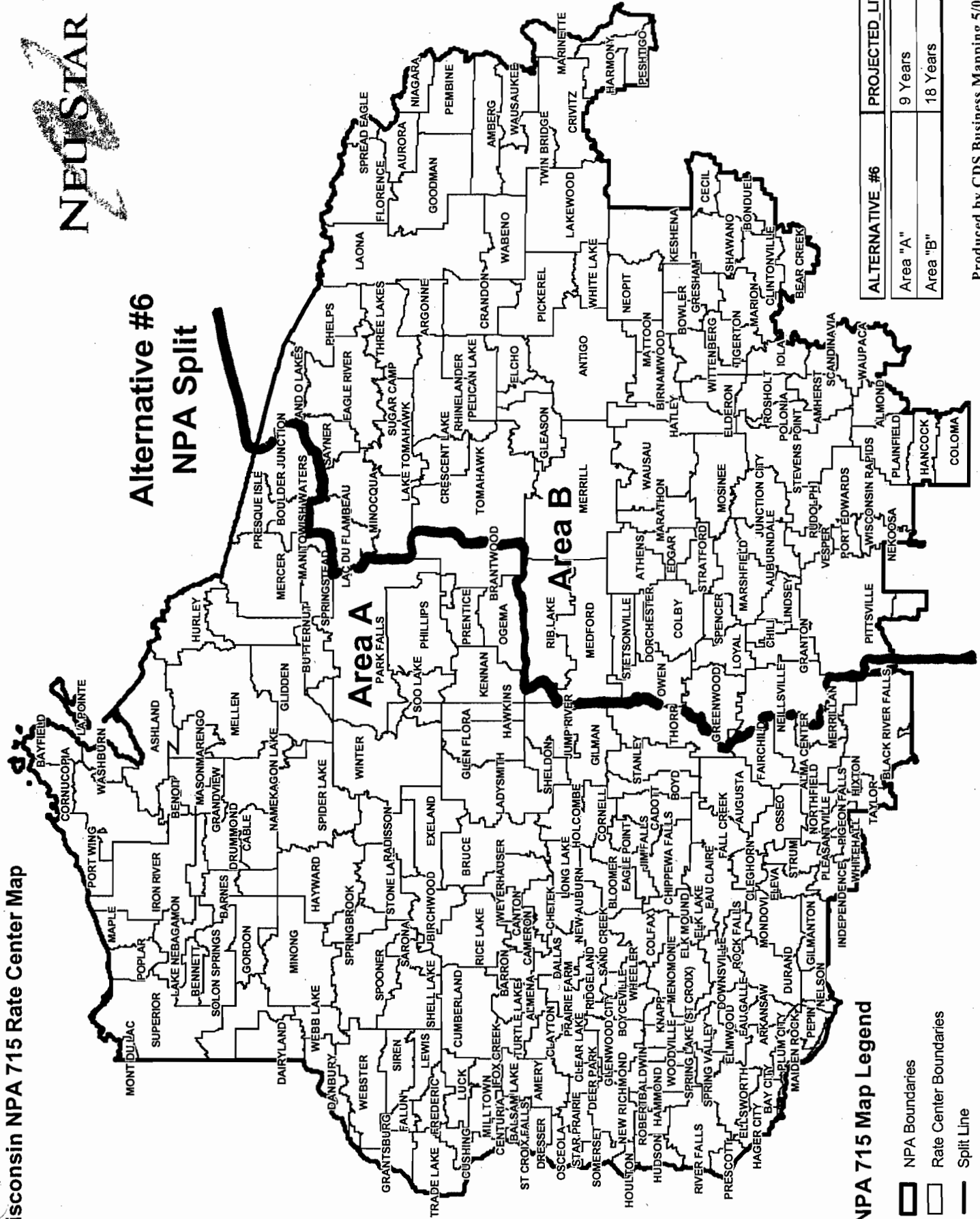
In examining a geographic split alternative for area code relief, the location of the boundary between the area codes is a matter for the Commission to address. Although the Industry participants do not support a geographic split for this area; it has identified a proposed boundary for the split of the area, if one is pursued. A map showing the industry's proposed demarcation between the two geographic area code areas is attached to this notice as Attachment C (identified as Alternative #6 in the NeuStar filing). The boundary that the industry identified basically splits the 715 area in half with a north-south line drawn through the existing area. The industry did not make a proposal as to which of the two areas would retain the 715 area code.

With this split option, NeuStar estimates that the western part of the split would not need further area code relief for 9 years and the eastern part would not need further area code relief for 18 years.

A geographic split plan for area code relief has no impact on the rates to customers for long distance or local calls.

(now at t:\ss\notice\05-TN-100 NOI Attachment A)

Alternative #6 NPA Split



NPA 715 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #6	PROJECTED LIVES
Area "A"	9 Years
Area "B"	18 Years